



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GREAT LAKES NATIONAL PROGRAM OFFICE
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MEMORANDUM

SUBJECT: Recommendation to Sign the First Amendment to the Project Agreement for the Great Lakes Legacy Act Remedial Design of the Cuyahoga River Gorge Dam in the Cuyahoga River Area of Concern, Cuyahoga Falls, Ohio

FROM: Chris Korleski, Director
Great Lakes National Program Office

TO: Kurt A. Thiede
Regional Administrator and Great Lakes National Program Manager

Enclosed for your review and signature is an Amendment to the Great Lakes Legacy Act (GLLA) Project Agreement (PA) for remedial design of the Cuyahoga River Gorge Dam in Cuyahoga Falls, Ohio, within the Cuyahoga River Area of Concern (AOC). The original PA between GLNPO and Ohio Environmental Protection Agency (OEPA) was signed on June 18, 2018. This Amendment includes: 1) an increase of the estimated total project cost from \$1,300,000 to \$1,890,000; 2) the addition of the City of Akron as a non-federal sponsor; and 3) modifications to the Statement of Work (SOW). This project meets all GLLA requirements for remedial design projects, and GLNPO will provide up to 65% of the total project cost. GLNPO will provide its cost-share through funding from the Great Lakes Restoration Initiative (GLRI).

The increase in the estimated total project cost is necessary to fully fund the design contractor's current work plan through the final design stage. Additional work to be conducted by the design contractor was identified based on results from the pre-design investigation and during discussions with stakeholders. GLNPO anticipates this additional work will increase the estimated total project cost to approximately \$1,890,000. The City of Akron is added as a non-federal sponsor to facilitate the transfer of cash payments to GLNPO and to satisfy the non-federal match requirement. The SOW was revised to: 1) delete the design effort for the removal of the Gorge Dam structure (which is now being funded under a GLRI grant to the City of Akron); 2) include plans and specifications for the construction of a containment area to permanently store the contaminated sediment from the Cuyahoga River; 3) clarify and provide additional detail on the project tasks, deliverables, and responsibilities of each partner; and 4) update the budget breakdown table.

Sediment behind the Gorge Dam is contaminated primarily with polycyclic aromatic hydrocarbons (PAHs) with a maximum concentration of 86 ppm and average concentration of 52 ppm. Fifteen of the 25 stations sampled show measured acute or chronic effects for benthic toxicity. Over 830,000 cubic

yards of contaminated sediment behind the dam structure must be addressed prior to decommissioning and removal of the 57-foot high dam to meet restoration goals for the AOC. This remedial design focuses on the removal and management of the contaminated sediment.

The PA Amendment has already been signed by the non-federal sponsors and is ready for your signature. The PA Amendment was prepared and reviewed by the Office of Regional Counsel (ORC). Details of the ORC review and analysis are provided in the ORC concurrence memorandum that is included in this package.

GLNPO anticipates funding the work associated with this Amendment with FY20 GLRI appropriations or with non-federal funds, depending on the timing of receipt of the cash payment from the City of Akron. The project meets all requirements of the GLLA.

In conclusion, I recommend that you approve and execute this PA Amendment for Remedial Design for the Cuyahoga River Gorge Dam project.